

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

IAN BROWN, JAMES BROWN
and BARBARA BROWN,
Plaintiffs

C.A. No. 04-1924-RGS

v.
UNITED STATES OF AMERICA,
VERIZON NEW ENGLAND, INC.
and BOSTON EDISON COMPANY
aka NSTAR ELECTRIC

FILED IN
OPEN COURT
7/25/05

M. J. Johnson
Asst. Clerk

PROPOSED DISCOVERY SCHEDULE

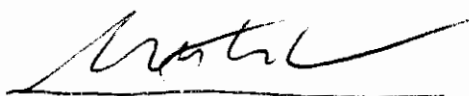
The parties propose the following discovery
schedule:

- | | <u>(To be completed by)</u> |
|-----------------------------------|-----------------------------|
| 1. Non-expert discovery: | 12/1/05 |
| 2. Plaintiffs' Expert Disclosure: | 1/30/06 |
| 3. Defendants' Expert Disclosure: | 3/1/06 |
| 4. Expert depositions: | 5/1/06 |
| 5. Dispositive motions: | 6/15/06 (File By) |

In the event the United States of America is

Approved: R.M. Stewart JS 7-25-05.

not dismissed as a party with respect to
Plaintiffs' claims and/or the Defendants' cross-claim,
it shall have the right seek a modification of
the Discovery Schedule.



Scott Charnas

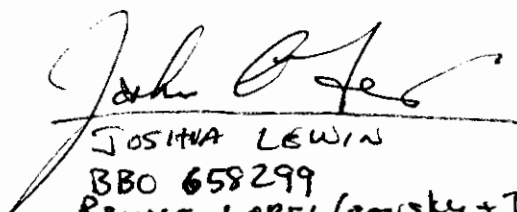
BBO # 081240

Manheim & Charnas, LLP
210 Commercial St.

Boston, MA 02109

Tel 617-557-4700

VERIZON New England, Inc.



JOSHUA LEWIN

BBO 658299

PRINCE LOBEL GROSSKY & TYE LLP
585 Commercial St

BOSTON MA 02109

(617) 456-8183

Boston Edison Company



Michael K. Callahan

BBO #546660

NSTAR ELECTRIC & GAS CORP.

800 Boylston St., 17th Fl.

BOSTON, MASS. 02199

(617) 424-2102